

Graves Bartle & Marcus LLC

Counselors and Attorneys at Law
• www.gravesbartlemarcus.com •

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Todd P. Graves
tgraves@gravesbartlemarcus.com
Direct Dial (816) 236-3173
Fax (816) 817-0780

2008 OCT 20 P 2:46

October 17, 2008

VIA FEDERAL EXPRESS

Thomasenia P. Duncan
General Counsel
Federal Election Commission
999 E. Street, N.W.
Washington, DC 20463

MUR # 6099

Re: Graves v. Page

Dear Ms. Duncan:

This letter encloses a complaint I am filing on my own behalf against Missouri Representative Sam Page, a candidate for Lieutenant Governor. The complaint alleges that Rep. Page has knowingly and willfully accepted a \$10,000 contribution from Waverley Glen, a Canadian company wholly owned by Prism Medical Ltd., (another Canadian company), in violation of 2 U.S.C. § 441c.

As you know, the federal ban on foreign contributions in candidate elections extends to state and local elections as well. 2 U.S.C. § 441c(a)(1)(A).

I believe Rep. Page's acceptance of this contribution presents a rare but extremely serious violation of our country's long-standing ban on foreign contributions in U.S. elections. The subject donation appears to have been made with a check drawn on a foreign company's bank account (not any U.S. subsidiary). Rep. Page's campaign apparently received it in an envelope bearing a Canadian address. Because Rep. Page nonetheless represents that the source of funds is not foreign, I believe this is a knowing and willful violation, and am sending a copy of this complaint to the United States Department of Justice for its concurrent investigation.

Please direct all communications regarding this matter to my law office (as noted in the Complaint). I understand that the Commission has many important matters on its hands, but would respectfully request that the Commission move forward promptly with its consideration of this matter.

Sincerely,



Todd P. Graves

Downtown at 11th and Main
1100 Main Street • Suite 2600 • Kansas City, Missouri 64105

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**BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES**

2008 OCT 20 P 2:46

TODD P. GRAVES,
Complainant,

MUR # 6099

v.

SAM PAGE,
Respondent.

Docket No. _____

COMPLAINT

Pursuant to 2 U.S.C. § 437g and 11 C.F.R. § 111.4, Complainant alleges:

1. Complainant, Todd P. Graves, is a resident of Platte County, Missouri, and may be reached at the following address and telephone number:

1100 Main Street
Suite 2600
Kansas City, MO 64105
(816) 256-3181
2. Respondent, Representative Sam Page, is a resident of Creve Coeur, Missouri. Rep. Page is currently serving his third term in the Missouri House of Representatives and is running as a Democrat in the November 4, 2008, election for the office of Missouri Lieutenant Governor.
3. On October 4, 2008, Representative Page violated 2 U.S.C. § 441e by accepting and receiving a contribution from a foreign national. The provisions of § 441e apply to any "contribution or donation, in connection with a Federal, State, or local election." 2 U.S.C. § 441e(a)(1)(A).

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4. Specifically, Rep. Page received and accepted a \$10,000 contribution from Waverley Glen, a Canadian medical equipment and services company whose principal place of business is 87 Sharer Road, Vaughan, Ontario, Canada, L4L 8Z3. See Campaign Finance Report of Sam Page, October 4, 2008, attached hereto as Exhibit A.
 5. Waverley Glen made its payment via corporate check. See Exhibit B. The check is drawn on the bank account of "Waverley Glen, A Prism Medical Company." *Id.* It contains what purport to be two authorized signatures, and is dated September 25, 2008. *Id.* It is made out to "Page for Missouri" in the amount of \$10,000. *Id.* The number of the check is 1013. *Id.* The check was included with an envelope or card containing the Waverley Glen logo and the following address: 87 Sharer Road, Vaughan, Ontario, Canada, L4L 8Z3. See Exhibit B.

**Waverley Glen Is a Canadian Subsidiary of a Canadian Parent
Company Which Is Attempting to Expand in the United States But
Whose Overall U.S. Operations Are Not a Substantial Part of its Business.**

6. Waverley Glen is a wholly-owned subsidiary of Prism Medical Ltd., a Canadian company. The following statement appears on the "About Us" page of Waverly's website:

As part of Prism Medical, Waverley Glen is one of a group of companies that operate throughout North America and Europe. So you don't just have the resources, expertise and knowledge of Waverley at your disposal, you have the expertise of all of the Prism Medical companies to draw from. Prism Medical is publicly traded on the Toronto Stock Exchange (www.tsx.com) under the ticker symbol "PM".

See <http://www.waverleyglen.com/About/AboutWG.aspx> (attached hereto as Exhibit C).

7. Waverley Glen's website links to the website of Prism Medical Ltd., its parent, which is also a Canadian company. See <http://www.prismmedicaltd.com> (attached hereto as Exhibit D).

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8. Prism claims to have "four main subsidiaries focused on the manufacture, distribution sale installation of lift, transfer and handling devices."

<http://www.prismmedicaltd.com/About/corporate-overview.aspx> (attached hereto as

Exhibit E). These subsidiaries are Waverley Glen Systems Limited ("our North American operating subsidiary based in Concord, Ontario"), Westholme Limited (a United Kingdom subsidiary); Care Free Lifting (another United Kingdom subsidiary); and Freeway Health Care (a United Kingdom subsidiary based in North Wales). *Id.*

9. Prism states that the Concord, Ontario, location of Waverley Glen "includes a manufacturing facility with a showroom/training centre. Waverley Glen also has showroom/sales centres in Montreal, Quebec and Orlando, Florida." *Id.* A review of the Missouri Secretary of State's online corporate record system discloses no entity listed as or including the name "Waverley Glen," that is licensed to do business in Missouri.
10. Although Prism refers to entities such as Waverley as legal "subsidiaries," its most recent financial statements state that "The Company [Prism] is organized and managed as a single operating segment being a supplier of medical products and the Company is viewed as a single operating segment by the chief operating decision maker for the purposes of resource allocations and assessing performance." *See Consolidated Financial Statements of Prism Medical Ltd., Second Quarter of 2008, May 31, 2008, attached hereto as Exhibit F.*
11. Prism wholly owns all of these subsidiaries (including Waverley). *See Consolidated Financial Statements of Prism Medical Ltd., November 30, 2007 and 2006, Notes, p.1, "Principles of Consolidation," attached hereto as Exhibit G.*

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12. Upon information and belief, Prism's operations in the United States are not yet substantial enough to generate a significant portion of its overall revenues. In Canadian dollars, Prism had 2007 revenues of \$43,771,000. Its United Kingdom-attributable revenues were over \$29 million, its Canadian revenues were \$11 million, and its U.S. revenues were only \$3 million (Canadian dollars). *See* Exhibit G, Notes, p. 23. *See also* Exhibit G, Notes, pages 4-5 (unlike U.K. operations, U.S. operations are not free-standing and for foreign currency translation purposes are considered integrated with Canadian operations).
13. Also upon information and belief, Prism hopes to increase "demand" for its products through "increased government funding." *See* Prism "Corporate Overview" at <http://www.prismmedicaltd.com/About/corporate-overview.aspx>. (Exhibit E)
14. Upon information and belief, Prism has been attempting to gain increased access to the U.S. market through, among other things, purchasing the assets of smaller U.S. medical equipment and services companies. *See* Exhibit F, Notes, point 3, "Acquisitions"; Exhibit G, Notes, point 4 "Acquisitions."
15. Respondent Page has a background in the home healthcare industry serviced by Prism and its Canadian and U.K. subsidiaries. On August 18, 2008, Rep. Page received a contribution from the Chief Operating Officer of Prism Medical Ltd., Charley Wallace, for \$1,350. Rep. Page's Missouri Campaign Finance report lists Mr. Wallace as having the COO position with Prism Medical Ltd. *See* Exhibit H, attached hereto.

Waverley Glen and Prism Medical Ltd. Are Foreign Nationals

16. To the extent it is a legal entity and has a legal existence separate from Prism Medical Ltd., Waverley Glen is itself a Canadian company and is therefore a "foreign national" under 2 U.S.C. § 441(e) and 22 U.S.C. § 611(b).
17. To the extent Waverley Glen is simply a division or instrumentality of Prism Medical Ltd., Prism Medical Ltd. is a Canadian company and is therefore a "foreign national" under 2 U.S.C. § 441(e) and 22 U.S.C. § 611(b).
18. Thus, whether Rep. Page accepted the check from Waverley Glen or Prism Medical Ltd., he accepted a check drawn on the funds of a foreign national.

**There Is Probable Cause that Rep. Page Committed a Crime
Because, Upon Information and Belief, His Violation of the Ban on Foreign
Contributions in Federal, State, and Local Elections Was Knowing and Willful**

19. Upon information and belief, Rep. Page's acceptance of \$10,000 from Waverley Glen, a foreign national whose total revenues from all of its U.S. operations could have yielded no more than \$3 million in 2007 (*see* Exhibit G), was a knowing and willful violation of 2 U.S.C. § 441e.
20. Under the FEC's regulations, "knowingly" means that a person must:
- (i) Have actual knowledge that the source of the funds solicited, accepted, or received is a foreign national;
 - (ii) Be aware of facts that would lead a reasonable person to conclude that there is a substantial probability that the source of the funds solicited, accepted, or received is a foreign national; or
 - (iii) Be aware of facts that would lead a reasonable person to inquire about whether the source of the funds solicited, accepted, or received is a foreign national, but the person failed to conduct a reasonable inquiry.

11 CFR 110.20(a)(4).

Pertinent facts include, but are not limited to, the fact that "the donor provides a foreign address" or "the contributor or donor resides abroad." 11 CFR 110.20(5) (ii) and (iv).

21. In various press reports, Rep. Page has already admitted that the contribution came from Waverley Glen and came in an envelope bearing a Canadian address—the Canadian address of Waverley Glen. The check itself was drawn on the bank account of “Waverley Glen, a Prism Medical Company.” Thus, Rep. Page had “actual knowledge” of the foreign source of the funds.

22. If Rep. Page had any doubt about whether the envelope was authentic, he was at least on inquiry notice about whether Waverley and its parent companies were Canadian. This gave rise to a duty to undertake a reasonable investigation. As discussed above, a very short internet search would have disclosed that Waverley and its parent are, in fact, Canadian companies who generate most of their business and revenues from abroad.

23. When the Missouri press raised concerns with Rep. Page regarding the Waverley contribution, he did not act to correct it. Rather, he attempted to conceal its foreign source. On October 17, 2008, in response to various questions raised about the donation, Rep. Page filed an “amended” report with the Missouri Ethics Commission listing the \$10,000 as a contribution from “Waverly [sic] Glen, a Prism Medical Company.” Now, however, the report lists a St. Louis, Missouri, address for Waverley Glen. See Exhibit I, attached hereto.

24. As discussed above, there is no registration on the Missouri Secretary of State website indicating that Waverley Glen is registered to do business through a St. Louis, Missouri, office. Neither Waverley nor Prism indicate that they operate through a St. Louis office. But all of this is ultimately irrelevant, because the presence of a St. Louis address, even if Waverley Glen is doing business there without a valid Missouri license, is meaningless. The only relevant fact is whether Waverley Glen is a Canadian company. As discussed

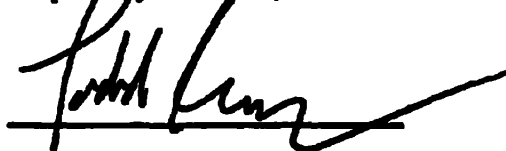
above, under 2 U.S.C. § 441e and 22 U.S.C. § 611(b), there is no question that Waverley Glen is a Canadian company.

25. Rep. Page's conduct on October 17 is an admission that he has only now performed an investigation of the source of the \$10,000. The investigation has not been in good faith because Rep. Page even now attempts to maintain that the \$10,000 did not come from a Canadian company. As an initial matter, the fact that a business whose sum total of operations only generated \$3 million (Canadian) in United States revenues in all of 2007 has \$10,000 in cash to donate in a Missouri state race should raise serious doubt about whether the true source of the contribution is a U.S. company. But Waverley's and Prism's admissions that they are, in fact, Canadian companies, decide this matter. Rep. Page's receipt and acceptance of \$10,000 from Waverley is, upon information and belief, knowing and willful.

26. Complainant is the former United States Attorney for the Western District of Missouri. He is an attorney, is not a candidate for political office, and does not file this Complaint on behalf of any candidate.

Dated: October 17, 2008

Respectfully Submitted,



Todd P. Graves (Mo. 41319)

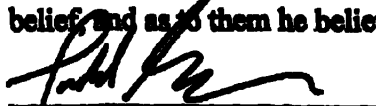
GRAVES, BARTLE & MARCUS LLC
1100 Main Street, Suite 2600
Kansas City, MO 64105
(816) 256-3181

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STATE OF MISSOURI

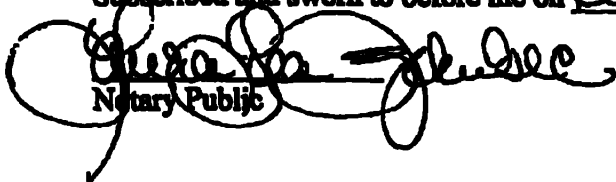
COUNTY OF JACKSON

TODD P. GRAVES, first being duly sworn, on oath deposes and says: That he is the Complainant, that he has read the foregoing complaint and knows the contents thereof; and that the matters therein stated are true of his own knowledge, except those matters on information and belief, and as to them he believes it to be true.



TODD P. GRAVES

Subscribed and sworn to before me on October 17, 2008


Notary Public



LAURA LEA JAQUEZ
My Commission Expires
February 14, 2009
Clay County
Commission #09080000

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EXHIBIT

A



MISSOURI ETHICS COMMISSION

CONTRIBUTION OF MORE THAN \$5,000.00 RECEIVED BY ANY COMMITTEE FROM ANY SINGLE DONOR - TO BE FILED WITHIN 48 HOURS OF RECEIVING THE CONTRIBUTION

MEC ID: C051078

NAME OF COMMITTEE PAGE FOR MISSOURI		DATE 10/4/2008
INSTRUCTIONS PURPOSE: The purpose of this form is to report within 48 hours the receipt of a single contribution of more than \$5,000.00 received from any single contributor. This information should also be included in the next full disclosure report filed by your committee. Required Pursuant To Section 130.044 RSMo.		
1. NAME, ADDRESS AND OCCUPATION (LIST COMMITTEES FIRST)	2. DATE RECEIVED	3. AMOUNT RECEIVED (CHECK IF MONETARY OR IN-KIND)
NAME: Life Sciences Fund of the Greater Kansas City ADDRESS: Chamber of Commerce PA CITY/STATE: 911 Main St, Ste 2600 EMPLOYER: Kansas City, MO 64105 <input checked="" type="checkbox"/> COMMITTEE:	10/4/2008	\$ 5,000.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: Midwest Region Laborers' Political League ADDRESS: Education Fund CITY/STATE: 423 East High Street EMPLOYER: Jefferson City, MO 65101 <input checked="" type="checkbox"/> COMMITTEE:	10/3/2008	\$ 10,000.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: WAVERLY GLEN ADDRESS: _____ CITY/STATE: _____ EMPLOYER: _____ <input type="checkbox"/> COMMITTEE:	10/4/2008	\$ 10,000.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: _____ ADDRESS: _____ CITY/STATE: _____ EMPLOYER: _____ <input type="checkbox"/> COMMITTEE:		\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: _____ ADDRESS: _____ CITY/STATE: _____ EMPLOYER: _____ <input type="checkbox"/> COMMITTEE:		\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: _____ ADDRESS: _____ CITY/STATE: _____ EMPLOYER: _____ <input type="checkbox"/> COMMITTEE:		\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: _____ ADDRESS: _____ CITY/STATE: _____ EMPLOYER: _____ <input type="checkbox"/> COMMITTEE:		\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: _____ ADDRESS: _____ CITY/STATE: _____ EMPLOYER: _____ <input type="checkbox"/> COMMITTEE:		\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND

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EXHIBIT

B

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EXHIBIT

C



Waverley Glen has been focused on the safe transfer and repositioning of people since the company was founded in 1988. Since then, we've been supplying ceiling lifts, floor lifts, and transfer aids across North America.

All of Your Transfer & Repositioning Needs

No one solution fits all. Sometimes the best solution is a transfer sheet. Sometimes it's a floor lift. Sometimes it's a ceiling lift. Sometimes the best solution changes with your needs. Waverley Glen manufactures and services a full range of products dedicated to providing you independence in the most practical and cost-effective manner possible. We can provide the right product to fit your needs. Our high-quality products include:

- > Ceiling Lifts;
- > Floor Lifts and Stand-aids;
- > Shower Chairs;
- > Transfer and repositioning aids.

Experience, Dealer Expertise, and Local Support Make the Difference

With so many years of experience under their belts, our staff and our dealer partners are experts. We take pride in knowing our products and how to use them in real-life settings. We work exclusively with only the best homecare dealers, and we take great care in selecting them and offering them our total support. That way, we can ensure that they are the best trained, most knowledgeable, and most service-oriented in their local markets. Our experience and understanding helps us design the best products. Our dealers ensure that we provide the best service.

We Know Ceiling Lifts

Our goal is the same now as when we started: to develop good, quality health care equipment, equipment that makes dignified care possible in both the home and in institutions like nursing homes and hospitals. Together with our dealer-partners we've installed over 30,000 ceiling lifts in every setting imaginable. All those installations add up to a lot of experience. In fact, we've already completed many installations in circumstances very similar, if not identical, to yours.

Our dealers are committed to making our ceiling lifts work for you. Their job isn't finished once they've installed a Waverley Glen ceiling lift and cleaned up all of their work. Like the famous bunny, they keep on going. They will show you how to use the lift and make sure that you are comfortable with it. They'll help you fit it into your everyday routine. And they'll answer all of your questions while providing you with the kind of service that customers of Waverley Glen can expect.

Part of Prism Medical

As part of Prism Medical, Waverley Glen is one of a group of companies that operate throughout North America and Europe. So you don't just have the resources, expertise and knowledge of Waverley at your disposal, you have the expertise of all of the Prism Medical companies to draw from. Prism Medical is publicly traded on the Toronto Stock Exchange (www.tsx.com) under the ticker symbol "PM".

<http://www.waverleyglen.com>

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EXHIBIT

D

PRISM MEDICAL



Prism Medical Ltd. is a provider of durable medical equipment and related services to the mobility disadvantaged in Canada, the USA and the United Kingdom (UK). Operating since 1996, Prism services the mobility disadvantaged wherever they reside – the home, long-term care facilities or acute care facilities.

Favorable demographics, increased government funding, and the cost benefits of home care versus institutional care are increasing demand for our core product, ceiling lifts. Ceiling lifts are a mobility aid which transfers immobile people from one position to another such as bed to wheelchair. Transfers are accomplished without care-givers having to lift patients; thus reducing injury and maximizing the ease of transfer.

All dividends are eligible for Canadian Tax Purposes unless indicated otherwise

<http://www.prismmedicaltd.com>

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EXHIBIT

E

PRISM MEDICAL



CORPORATE OVERVIEW

Prism Medical Ltd. is a provider of durable medical equipment and related services to the mobility disadvantaged in Canada, the USA and the United Kingdom (UK). Operating since 1996, Prism services the mobility disadvantaged wherever they reside – the home, long-term care facilities or acute care facilities.

Our mission is to save the healthcare system money and improve the quality of life of the mobility disadvantaged and their caregivers by providing superior services and products that most effectively solve the problems related to moving and handling people.

Favorable demographics, increased government funding, and the cost benefits of home care versus institutional care are increasing demand for our core product, ceiling lifts, both fixed and portable.

Ceiling lifts are a mobility aid that transfer immobile people from one position to another such as bed to wheelchair. It has a superior technology to other products used to move and handle people and is considered 'best practice' in most jurisdictions. It performs its functions with less risk of injury to the end user and to the caregiver and at a lower cost to the healthcare system.

We also sell other related durable medical equipment within the moving and handling segment through all three main customer channels (homecare, long-term care and acute care facilities).

Prism Medical Ltd. has four main subsidiaries focused on the manufacture, distribution sale installation of lift, transfer and handling devices.

Waverley Glen Systems Limited is our North American operating subsidiary based in Concord, Ontario. This location includes a manufacturing facility with a showroom/training centre. Waverley Glen also has showroom/sales centres in Montreal, Quebec and Orlando, Florida. Waverley Glen primarily sells its products through an extensive system of home-care dealers in Canada and the US, to whom it provides quick delivery and a comprehensive service involving upfront and ongoing advice about every element of our equipment and its installation. Waverley Glen's rapid growth is made possible by a team of first-class people who have extensive experience in this segment of the medical products industry.

Westholme Limited provides estimating, installation and maintenance services pursuant to the installation and sale of durable medical equipment to the homecare market in the UK from four locations on a scale that makes them the largest homecare dealer of their kind in the UK. Nineteen years in the business and a pioneer in ceiling lifts, the employees of this service-oriented company have a wealth of knowledge they use to provide practical solutions to the mobility disadvantaged.

Care Free Lifting is a distributor of lifting equipment for elderly and disabled people. Located near Manchester, UK, Care Free supplies a range of products including mobile (floor) lifts, ceiling lifts and wet products. Services provided include training, installation and repair and

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maintenance.

Freeway Healthcare operates two manufacturing plants in North Wales.

Freeway manufactures and assembles a line of ceiling lifts in its Denbighshire, Wales facility.

The company sells its ceiling lift model together with ceiling track and related accessories, free standing gantries and slings to homecare dealers in Wales, England, Scotland and Europe.

Freeway also manufactures and distributes a line of shower chairs to UK dealers, its sister company Westholme and now to Waverley Glen in North America. Freeway shower chairs are manufactured in Abergele, Wales.

AWB

<http://www.prismmedicaltd.com>

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EXHIBIT

F

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EXHIBIT
H



MISSOURI ETHICS COMMISSION
CONTRIBUTIONS RECEIVED - SUPPLEMENTAL

NAME OF COMMITTEE
PAGE FOR MISSOURI

DATE
9/4/2008

INSTRUCTIONS

PURPOSE: The purpose of the Contributions Received supplement is to provide a printed outline for attaching additional pages to Form CD1 (Contributions Received). This form should be used as additional space for reporting persons contributing more than \$100 and for committee contributions. This form may be reproduced as needed.

Total all itemized contributions at the bottom of the page and carry to item 7 (Subtotal: Itemized Contributions From Any Attached Pages) on Form CD-1.

If further information is needed concerning reporting itemized expenditures, see Form CD-1 instructions.

A. ITEMIZED CONTRIBUTIONS RECEIVED FROM COMMITTEES REGARDLESS OF THE AMOUNT, OR FROM PERSONS GIVING MORE THAN \$100 TO A COMMITTEE.	4. DATE RECEIVED AGGREGATE TO DATE	5. AMOUNT RECEIVED (CHECK IF MONETARY OR IN-KIND)
1. NAME, ADDRESS AND OCCUPATION (LIST COMMITTEES FIRST) NAME: ADDRESS: United Steel Workers of America WMO & EKS CITY/STATE: Steel Advisory Council 3678 S. Moland Road, Suite 310 EMPLOYER: Independence, MO <input checked="" type="checkbox"/> COMMITTEE:	8/11/2008 \$ 250.00	\$ 250.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: United Steelworkers Eastern Mo St Coun Fnd CITY/STATE: 3307 Hollenberg Drive. EMPLOYER: Bridgeton, MO <input type="checkbox"/> COMMITTEE:	8/28/2008 \$ 400.00	\$ 400.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: United Steelworkers, District 11 CITY/STATE: District Director 2929 University AvenueSE, Suit EMPLOYER: Minneapolis, MN <input checked="" type="checkbox"/> COMMITTEE:	8/28/2008 \$ 1,350.00	\$ 1,350.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: United Surgical Partners International CITY/STATE: 10733 Sunset Office Drive Suite 200 EMPLOYER: St. Louis, MO <input checked="" type="checkbox"/> COMMITTEE:	8/29/2008 \$ 1,500.00	\$ 1,000.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: Jacques B. Van Ryn CITY/STATE: [redacted] EMPLOYER: Premier Care Orthopedics/Physician <input type="checkbox"/> COMMITTEE:	8/11/2008 \$ 2,000.00	\$ 1,000.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: Devakar Veerleenti CITY/STATE: [redacted] EMPLOYER: 827ech/Pres/CEO <input type="checkbox"/> COMMITTEE:	8/18/2008 \$ 1,000.00	\$ 500.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: Benjamin Verdine CITY/STATE: [redacted] EMPLOYER: Physician <input type="checkbox"/> COMMITTEE:	7/31/2008 \$ 150.00	\$ 150.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: Charley Wallace Jr. CITY/STATE: [redacted] EMPLOYER: Prism Medical Ltd./Chief Operating Officer <input type="checkbox"/> COMMITTEE:	8/18/2008 \$ 1,350.00	\$ 1,350.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND

TOTAL: ITEMIZED CONTRIBUTIONS

(CARRY TO ITEM 7 "SUBTOTAL: ITEMIZED CONTRIBUTIONS FROM ANY ATTACHED PAGES" ON FORM CD-1)

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EXHIBIT

I

**MISSOURI ETHICS COMMISSION****CONTRIBUTION OF MORE THAN \$5,000.00 RECEIVED BY ANY COMMITTEE FROM ANY SINGLE DONOR - TO BE FILED WITHIN 48 HOURS OF RECEIVING THE CONTRIBUTION**MEC ID: **C051078**

NAME OF COMMITTEE PAGE FOR MISSOURI		DATE 10/17/2008
PURPOSE: The purpose of this form is to report within 48 hours the receipt of a single contribution of more than \$5,000.00 received from any single contributor. This information should also be included in the next full disclosure report filed by your committee. Required Pursuant To Section 130.044 RSMo.		
1. NAME, ADDRESS AND OCCUPATION (LIST COMMITTEES FIRST)	2. DATE RECEIVED	3. AMOUNT RECEIVED (CHECK IF MONETARY OR IN-KIND)
NAME: Waverly Glen, A Prism Medical Company ADDRESS: 2351 Grissom Dr. CITY/STATE: St. Louis, Missouri 63146 EMPLOYER: This is an Amendment to a report filed October <input type="checkbox"/> COMMITTEE:	10/4/2008	\$ 10,000.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: <input type="checkbox"/> COMMITTEE:		\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: <input type="checkbox"/> COMMITTEE:		\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: <input type="checkbox"/> COMMITTEE:		\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
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NAME: ADDRESS: CITY / STATE: EMPLOYER: <input type="checkbox"/> COMMITTEE:		\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: CITY / STATE: EMPLOYER: <input type="checkbox"/> COMMITTEE:		\$ <input type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND

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MISSOURI ETHICS COMMISSION
CONTRIBUTIONS RECEIVED - SUPPLEMENTAL

NAME OF COMMITTEE PAGE FOR MISSOURI	DATE 9/4/2008
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INSTRUCTIONS

PURPOSE: The purpose of the Contributions Received supplement is to provide a printed outline for attaching additional pages to Form CD1 (Contributions Received). This form should be used as additional space for reporting persons contributing more than \$100 and for committee contributions. This form may be reproduced as needed.

Total all itemized contributions at the bottom of the page and carry to item 7 (Subtotal: Itemized Contributions From Any Attached Pages) on Form CD-1.

If further information is needed concerning reporting itemized expenditures, see Form CD-1 instructions.

A. ITEMIZED CONTRIBUTIONS RECEIVED FROM COMMITTEES REGARDLESS OF THE AMOUNT, OR FROM PERSONS GIVING MORE THAN \$100 TO A COMMITTEE.	4. DATE RECEIVED AGGREGATE TO DATE	5. AMOUNT RECEIVED (CHECK IF MONETARY OR IN-KIND)
1. NAME, ADDRESS AND OCCUPATION (LIST COMMITTEES FIRST) NAME: ADDRESS: United Steel Workers of America WMO & EKS CITY/STATE: Steel Advisory Council 3675 S. Woland Road, Suite 310 EMPLOYER: Independence, MO <input checked="" type="checkbox"/> COMMITTEE:	8/11/2008 \$ 250.00	\$ 250.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: United Steelworkers Eastern Mo St Coun Fnd CITY/STATE: 3307 Hollenberg Drive. EMPLOYER: Bridgeton, MO <input type="checkbox"/> COMMITTEE:	8/28/2008 \$ 400.00	\$ 400.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: United Steelworkers, District 11 CITY/STATE: District Director 2929 University AvenueSE, Suit EMPLOYER: Minneapolis, MN <input checked="" type="checkbox"/> COMMITTEE:	8/28/2008 \$ 1,350.00	\$ 1,350.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: United Surgical Partners International CITY/STATE: 10733 Sunset Office Drive Suite 200 EMPLOYER: St. Louis, MO <input checked="" type="checkbox"/> COMMITTEE:	8/29/2008 \$ 1,500.00	\$ 1,000.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: Jacques A. Van Ryn CITY/STATE: [redacted] EMPLOYER: Premier Care Orthopedics/Physician <input type="checkbox"/> COMMITTEE:	8/11/2008 \$ 2,000.00	\$ 1,000.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: Devakar Veerapatti CITY/STATE: [redacted] EMPLOYER: 822tech/Pres/CSU <input type="checkbox"/> COMMITTEE:	8/18/2008 \$ 1,000.00	\$ 500.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: Benjamin Vardine CITY/STATE: [redacted] EMPLOYER: Physician <input type="checkbox"/> COMMITTEE:	7/31/2008 \$ 150.00	\$ 150.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
NAME: ADDRESS: Charley Wallace Jr. CITY/STATE: [redacted] EMPLOYER: Priem Medical Ltd./Chief Operating Officer <input type="checkbox"/> COMMITTEE:	8/18/2008 \$ 1,350.00	\$ 1,350.00 <input checked="" type="checkbox"/> MONETARY <input type="checkbox"/> IN-KIND
TOTAL: ITEMIZED CONTRIBUTIONS		--
(CARRY TO ITEM 7 "SUBTOTAL: ITEMIZED CONTRIBUTIONS FROM ANY ATTACHED PAGES" ON FORM CD-1)		